

legal principles is not so dissimilar that it would prevent compromise.

4. A judicial settlement conference is necessary because the intersection of the disputed facts combined with the near agreement on legal principles requires an appreciation of judicial analysis to focus the respective parties' interests/expectations. Contrasting this case with others is the complexity of how a factual distinction/disagreement discussed during a mediation session would translate into projected outcomes under various complexities in precedent given the focus of this case is a school setting. These cases require a mediation officer very cognizant of these fine distinctions particularly having had exposure to constitutional questions. Most private mediators will not have this experience.
5. The alternative to seeking this early resolution is time-consuming and expensive discovery vehicles and intensive motion practice. In the interests of judicial economy, seeking agreement at this stage is better than to wait until after protracted litigation.
6. Magistrate Judge Brown is understood to be available for judicial settlement conferences.
7. To aid in restricting litigation time and expense, it is respectfully requested that the pending deadline for amending pleadings be extended until after the mediation date.
8. During the conference with counsel today, defendant's counsel represented he would submit a prompt position on this motion -- before March 30, 2021.

WHEREFORE, Plaintiffs respectfully request this Court enter an Order allowing the parties to conduct a judicial settlement conference, and for any other relief this Court finds is equitable and just.

Respectfully submitted,

/s/Frederick H. Nelson
Frederick H. Nelson
Florida Bar No. 0990523
American Liberties Institute
P. O. Box 547503
Orlando, FL 32854-7503
Phone: (407) 786-7007
Fax: (877) 786-3573
Email: rick@ali-usa.org
Counsel for Plaintiffs
(Admitted *Pro Hac Vice*)

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been forwarded via the court's ECF/CM system to:

Kristin Fecteau Mosher (#19772)
The Law Office of Kristin Fecteau
5543 Edmonson Pike
Nashville, TN 37211
Phone: (615) 496-5747
Fax: (615) 691-7194
Email: kristin@fecteaulaw.com
Counsel for Plaintiffs

Kenneth S. Williams, Esq. (#10678)
**Madewell, Jared, Halfacre,
Williams & Wilson**
230 N. Washington Ave.
Cookeville, TN 38501
Phone: (931) 526-6101
Fax: (931) 528-1909
Email: ken@madewelljared.com
Counsel for Defendant

on this the 29th day of March, 2021.

/s/Frederick H. Nelson
Frederick H. Nelson
Florida Bar No. 0990523
American Liberties Institute
P. O. Box 547503
Orlando, FL 32854-7503
Phone: (407) 786-7007
Fax: (877) 786-3573
Email: rick@ali-usa.org
Counsel for Plaintiffs